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Attorneys for Defendant Liberty Mutual Insurance
Company

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA AT ANCHORAGE**

NIKITA TIPIKIN and USTINA ANDREEFF,

Plaintiffs,

v.

LIBERTY MUTUAL INSURANCE
COMPANY,

Defendant.

Case No. 3:12-cv-_____ (___)

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1332 and 28 U.S.C. § 1441, Defendant Liberty Mutual Insurance Company, through its counsel, Farley & Graves, P.C., gives notice that Case No. 3HO-12-295 CI, is hereby removed to the United States District Court for the District of Alaska from the Superior Court for the State of Alaska, Third Judicial District at Homer, where said

NOTICE OF REMOVAL
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case was originally filed and is currently pending. Liberty Mutual Insurance Company provides the following basis for the removal:

1. Removing party, Liberty Mutual Insurance Company is the defendant in the above-captioned action and in the underlying case;

2. On October 5, 2012, an action was commenced against Liberty Mutual Insurance Company by Nikita Tipikin and Ustina Andreeff in the Superior Court for the State of Alaska, Third Judicial District at Homer and is presently pending in that court;

3. Liberty Mutual Insurance Company was served with a summons and complaint on or about October 26, 2012;

4. This Notice is filed within thirty (30) days of the date of the original service on the defendant;

5. The above-entitled action involves citizens of different states, in that, at the time of the commencement of this action, Plaintiffs were citizens of the State of Alaska and resided in Alaska as alleged in their Complaint. Defendant Liberty Mutual Insurance Company is, and was at all times pertinent to this action, a Massachusetts stock insurance company subsidiary of Liberty Mutual Holding Company, Inc., a Massachusetts mutual holding company. Thus, complete diversity of citizenship exists between Plaintiffs and Defendant;

6. The amount in controversy, exclusive of interest and costs, is alleged to be in excess of \$100,000, due to Plaintiffs' filing in State Superior Court which requires a controversy in excess of \$100,000, a copy of the Complaint is attached as Exhibit A to this Notice and made by reference a part hereof;

Because of diversity of citizenship and the amount in controversy, this Court has original jurisdiction of the above-entitled action pursuant to 28 U.S.C. § 1332 and removal of the action to this Court is proper pursuant to 28 U.S.C. § 1441(a).

A copy of all process, pleadings, and orders served upon defendant Liberty Mutual Insurance Company is filed herewith in the Notice of Filing Pleadings.

DATED this 15th day of November 2012 at Anchorage, Alaska.

FARLEY & GRAVES, P. C.

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CERTIFICATE OF SERVICE

Pursuant to Civil Rule 5, I hereby certify that on this 15th day of November 2012 a true and correct copy of the foregoing document was served electronically on the following person(s):

C. Michael Hough, Esq.
3733 Ben Walters Lane, Suite 2
Homer, AK 99603

By: s/Laura L. Farley